

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re	)	Chapter 11
	)	
CIRCUIT CITY STORES, INC, <i>et al.</i>	)	Case No. 08-35653
	)	
Debtors.	)	Jointly Administered
_____	)	

**NOTICE OF ENTRY OF APPEARANCE, REQUEST  
FOR NOTICES AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE that CapTech Ventures, Inc., as a party in interest in the above-captioned case, hereby appears by its counsel, Holland & Knight LLP; such counsel hereby enters its appearance pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned cases be given and served upon the following:

Richard E. Lear  
Holland & Knight LLP  
2099 Pennsylvania Avenue, N.W.  
Suite 100  
Washington, D.C. 20006  
Telephone: (202) 457-7049  
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Richard E. Lear (VSB # 25361)  
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(202) 457-7049  
Counsel to CapTech Ventures, Inc.

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

This Notice shall not be deemed or construed to be a waiver of (a) CapTech Ventures, Inc.'s rights (i) to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, and (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (b) any other rights, claims, actions, setoffs, or recoupments to which CapTech Ventures, Inc. is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments CapTech Ventures, Inc. expressly reserves.

Dated: November 12, 2008

/s/ Richard E. Lear  
Richard E. Lear (VSB # 25361)  
HOLLAND & KNIGHT LLP  
2099 Pennsylvania Ave., NW  
Suite 100  
Washington, D.C. 20006-6801  
(202) 955-3000

Attorney for CapTech Ventures, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Entry of Appearance was mailed by U.S. first class mail, postage prepaid, this 12<sup>th</sup> day of November, 2008, to the following:

Robert B. Van Arsdale, Esq.  
Office of the United States Trustee  
701 East Broad Street, Suite 4304  
Richmond, VA 23219  
*Assistant United States Trustee*

Dion W. Hayes, Esq.  
McGuireWoods LLP  
One James Center  
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Richmond, VA 23219  
*Counsel for the Debtors*

Greg M. Galardi, Esq.  
Ian S. Fredericks, Esq.  
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Wilmington, DE 19899-0636  
*Counsel for the Debtors*

and that the foregoing Notice was also filed electronically via the Court's CM/ECF system on this date such that it would be served electronically on those parties entitled to receive such notice.

/s/Richard E. Lear  
Richard E. Lear